



Governor

Lori F. Kaplan
Commissioner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

to make Indiana a cleaner, healthier place to live.

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-

6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Penz Products, Inc.
1320 South Merrifield Avenue
Mishawaka, Indiana 46544**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-15168-00128	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 22, 2002 Expiration Date: May 22, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary truck/container component manufacturing plant.

Authorized individual:	David A. Penzenik
Source Address:	1320 South Merrifield Avenue, Mishawaka, Indiana 46544
Mailing Address:	1320 South Merrifield Avenue, Mishawaka, Indiana 46544
SIC Code:	3714
Source Location Status:	St. Joseph
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Metal Surface Coating Process (SC), identified as SC, constructed in 1985, and exhausting to stacks V12 - V14, including the following units:
 - (1) One (1) dip tank with a maximum capacity of 2,707.0 units per hour; and
 - (2) One (1) burn off oven.
- (b) Urethane Foam and Assembly Process, identified as UFA, exhausting to stacks V21, and V25-V30, including the following units:
 - (1) Three (3) urethane foam machines, identified as UFM1 through UFM3, constructed in 1972, 1972, and 2001; and
 - (2) One (1) hand application booth, with a maximum capacity of 350 unit per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (e) Closed loop heating and cooling systems.
- (f) Infrared cure equipment.
- (g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (h) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:
 - (1) Metal fabrication process, identified as MF, including the following units:
 - (A) Thirty-five (35) welders, identified as W31-W35;
 - (B) One (1) line cutter, identified as LC1, installed in 1985;
 - (C) Two (2) torches, identified as T3 and T4, installed in 1985.
- (j) Other emission units, not regulated by a NESHAP, emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:
 - (1) Vacuum forming process for plastics, identified as VF, with a maximum ABS plastic throughput rate of 400 pounds per hour.
- (k) Other emission units with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, and lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day:
 - (1) Insignificant activities associated with Plant 1, Building 1 (Metal Fabricating Area):
 - (A) Twenty (20) drill presses, identified as DP1-DP20.
 - (B) Three (3) horizontal mills, identified as HM1-HM3.
 - (C) Seven (7) punch presses, identified as PP1-PP7.
 - (D) Three (3) disk sanders, identified as DS1-DS3.

- (E) Six (6) grinders, identified as G1-G6.
 - (F) One (1) rolling machine¹, identified as RO1.
 - (G) Six (6) Riveting machines, identified as RM1-RM6.
 - (H) One (1) hydraulic bender¹, identified as HB1.
 - (I) Two (2) air presses, identified as AP1 and AP2.
 - (J) One (1) cut off saw, identified as COS1.
 - (L) One (1) hydraulic crimper, identified as HC1.
 - (M) One (1) lift-and-tilt process, identified as LT1.
 - (N) One (1) saw, identified as S1.
 - (O) Two (2) hydraulic presses, identified as HP1 and HP2.
 - (P) Five (5) turret lathes, identified as TL1-TL5.
 - (Q) One (1) vertical mill, identified as VM1.
 - (R) One (1) Richard bender, identified as RB1.
 - (S) One (1) metal muncher, identified as MM1.
 - (T) One (1) spot welder, identified as SW1.
 - (U) Two (2) plasma cutters, identified as PC1 and PC2.
- (2) Insignificant activities associated with Plant 1, Building 2 (Metal Fabricating Area):
- (A) Three (3) hydraulic benders, identified as HB2-HB4.
 - (B) Twenty-six (26) punch presses, identified as PP8-PP33.
 - (C) One (1) hydraulic roller, identified as HR1.
 - (D) Five (5) lift-and-filts, identified as LT2-LT6.
 - (E) Three (3) grinders, identified as G7-G9.
 - (F) One (1) disk sander, identified as DS4.
 - (G) One (1) blade sharpener, identified as BS1.
 - (H) Two (2) tube cute off saws, identified as TCOS1 and TCOS2.
 - (I) Three (3) horizontal band saws, identified as HBS1-HBS3.

- (J) One (1) Tringiger saw, identified as TS1 (new added).
- (K) One (1) brake press, identified as BP1.
- (L) Two (2) shears, identified as S1 and S2.
- (M) Three (3) vertical mills, identified as VM2-VM3.
- (N) One (1) hone, identified as HN1.
- (O) Two (2) hydraulic presses, identified as HP3 and HP4.
- (P) One (1) radial drill, identified as RD1.
- (Q) One (1) drill press, identified as DP41 (new added).
- (R) One (1) vertical band saw, identified as VBS1.
- (S) One (1) belt sander, identified as BTS1.
- (3) Insignificant activities associated with Plant 2, Building 1 (Urethane Foaming, Vacuum Forming and Assembly Area):
 - (A) Two (2) vacuum formers, identified as VF1-VF2.
 - (B) One (1) oven/press, identified as OP1.
 - (C) One (1) stencil machine, identified as SM1.
 - (D) Four (4) belt sanders, identified as BLS1-BLS4.
 - (E) Six (6) band saws, identified as BAS1-BAS6.
 - (F) One (1) electric welder, identified as EW1.
 - (G) Two (2) hydraulic presses, identified as HP5 and HP6.
 - (H) Two (2) sanders, identified as SA1 and SA2.
 - (I) Six (6) mounted hand routers, identified as MHR1-MHR6.
 - (J) One (1) hydraulic tracing drill, identified as HTD1.
 - (K) One (1) cut off saw, identified as COS2.
 - (L) Two (2) radial arm saws, identified as RAS1 and RAS2.
 - (M) One (1) table grinder, identified as TG1.
 - (N) Two (2) buffing jacks, identified as BJ1 and BJ2.
 - (O) One (1) mechanical shear, identified as MS1.

- (P) One (1) bender, identified as B1.
- (Q) One (1) roller, identified as R1.
- (R) One (1) hydraulic crimper, identified as HC2.
- (S) One (1) air shear, identified as AS1.
- (T) One (1) lift-and-tilt, identified as LT8.
- (U) One (1) tumbler, identified as TU1.
- (V) Two (2) lathes, identified as L1 and L2.
- (W) Three (3) table saws, identified as TA1-TA3.
- (X) One (1) planer, identified as P1.
- (Y) One (1) jig saw, identified as JS1.
- (Z) Two (2) torches, identified as T1 and T2.
- (AA) Twenty (20) drill presses, identified as DP21-DP40.
- (4) Insignificant activities associated with Plant 2, Building 2 (Storage Area):
 - (A) Two (2) punch presses, identified as PP34 and PP35.
 - (B) One (1) hydraulic bender, identified as HB5.
 - (C) One (1) trash compactor, identified as TC1 (new added).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

The emission units of the liquid argon storage tank (LA) and the liquid oxygen storage tank (LO) have been removed from this FESOP because these two tanks do not emit any regulated air pollutants and no permit conditions are applied to these tanks in the previous FESOP.

A.5 Prior Permits Superseded [326 IAC 2-1.1-95]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Telephone No.: 1-800-753-5519 or,
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ or Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The Potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Metal Surface Coating Process (SC), identified as SC, constructed in 1985, and exhausting to stacks V12 - V14, including the following units:
 - (1) One (1) dip tank with a maximum capacity of 2,707.0 units per hour; and
 - (2) One (1) burn off oven.
- (b) Urethane Foam and Assembly Process, identified as UFA, exhausting to stacks V21, and V25-V30, including the following units:
 - (1) Three (3) urethane foam machines, identified as UFM1 through UFM3, constructed in 1972, 1972, and 2001; and
 - (2) One (1) hand application booth, with a maximum capacity of 350 unit per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the HAPs input to the metal surface coating process (SC) and urethane foam and assembly process (UFA) shall be limited as follows:

- (a) The amount of any single HAP delivered to the dip tank and the hand application booth plus the amount of any single HAP used for clean-up shall be limited to 10 tons per twelve (12) consecutive month period.
- (b) The amount of any combination of HAPs delivered to the dip tank and the hand application booth plus the amount of any combination of HAPs used for clean-up, shall not exceed 25 tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Volatile Organic Compounds [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) that applies extreme performance coatings pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 Volatile Organic Compounds [326 IAC 2-8-4]

The potential to emit of VOC from the surface coating operation and urethane foam and assembly process is less than 100 tons per year. Therefore, 326 IAC 2-7 does not apply. Any change or modification which may increase the potential emissions to 100 tons per year or more of VOC must be approved by the Office of Air Quality before any such change may occur.

D.1.4 Volatile Organic Compounds [326 IAC 8-1-6]

The potential emissions of VOC from the hand application booth is less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) does not apply. Any change or modification which may increase the potential VOC emissions from the hand application booth to greater than twenty-five tons per year must be approved by IDEM, OAQ before any such change may occur,.

D.1.5 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the burn-off oven of the metal coating process shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.7 VOC and HAP Emissions

Compliance with Conditions D.1.1, D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total VOC and HAP usages for the most recent twelve (12) month period.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with VOC content and usage limitations contained in Conditions D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage, VOC content, and VOC usage limits established in Conditions D.1.1, D.1.2, D.1.3, and D.1.4.
- (1) The amount, the HAP content, and the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total HAP and VOC usage each month; and
 - (4) The weight of HAPs and VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) Metal fabrication process, identified as MF, including the following units:
 - (1) Thirty-five (35) welders, identified as W31-W35;
 - (2) One (1) line cutter, identified as LC1, installed in 1985;
 - (3) Two (2) torches, identified as T3 and T4, installed in 1985.
- (c) Insignificant activities associated with Plant 1, Building 1 (Metal Fabricating Area).
- (d) Insignificant activities associated with Plant 1, Building 2 (Metal Fabricating Area).
- (e) Insignificant activities associated with Plant 2, Building 1 (Urethane Foaming, Vacuum Forming and Assembly Area).
- (f) Insignificant activities associated with Plant 2, Building 2 (Storage Area).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the grinding operations and the metal fabrication area shall not exceed the allowable emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

Degreasing operations that do not exceed 145 gallons usage per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met.
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5 (b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Penz Products, Inc.
Source Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
Mailing Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
FESOP No.: F141-15168-00128

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Penz Products, Inc.
Source Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
Mailing Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
FESOP No.: F141-15168-00128

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
 (The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 (The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Penz Products, Inc.
Source Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
Mailing Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
FESOP No.: F141-15168-00128
Facility: One dip tank and one hand application booth.
Parameter: HAP usage
Limit: Less than 10 tons per (12) consecutive month period for any single HAP delivered to the applicators.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Penz Products, Inc.
Source Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
Mailing Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
FESOP No.: F141-15168-00128
Facility: One dip tank and one hand application booth.
Parameter: HAP usage
Limit: Less than 25 tons per (12) consecutive month period for any combination of HAPs delivered to the applicators.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Penz Products, Inc.
Source Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
Mailing Address: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
FESOP No.: F141-15168-00128

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:
Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

May 22, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: Penz Products, Inc.
Source Location: 1320 South Merrifield Avenue, Mishawaka, Indiana 46544
County: St. Joseph
SIC Code: 3714
Operation Permit No.: 141-15168-00128
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Penz Products, Inc. relating to the operation of a truck/container component manufacturing plant. Penz Products, Inc. was issued FESOP 141-7073-00128 on September 23, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Metal Surface Coating Process (SC), identified as SC, constructed in 1985, and exhausting to stacks V12 - V14, including the following units:
 - (1) One (1) dip tank with a maximum capacity of 2,707.0 units per hour; and
 - (2) One (1) burn off oven.
- (b) Urethane Foam and Assembly Process, identified as UFA, exhausting to stacks V21, and V25-V30, including the following units:
 - (1) Three (3) urethane foam machines, identified as UFM1 through UFM3, constructed in 1972, 1972, and 2001; and
 - (2) One (1) hand application booth, with a maximum capacity of 350 unit per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units or pollution control equipment being added during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (e) Closed loop heating and cooling systems.
- (f) Infrared cure equipment.
- (g) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (h) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:
 - (1) Metal fabrication process, identified as MF, including the following units:
 - (A) Thirty-five (35) welders, identified as W31-W35;
 - (B) One (1) line cutter, identified as LC1, installed in 1985;
 - (C) Two (2) torches, identified as T3 and T4, installed in 1985.
- (j) Other emission units, not regulated by a NESHAP, emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:
 - (1) Vacuum forming process for plastics, identified as VF, with a maximum ABS plastic throughput rate of 400 pounds per hour.
- (k) Other emission units with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, and lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day:

(1) Insignificant activities associated with Plant 1, Building 1 (Metal Fabricating Area):

- (A) Twenty (20) drill presses, identified as DP1-DP20.
- (B) Three (3) horizontal mills, identified as HM1-HM3.
- (C) Seven (7) punch presses, identified as PP1-PP7.
- (D) Three (3) disk sanders, identified as DS1-DS3.
- (E) Six (6) grinders, identified as G1-G6.
- (F) One (1) rolling machine¹, identified as RO1.
- (G) Six (6) Riveting machines, identified as RM1-RM6.
- (H) One (1) hydraulic bender¹, identified as HB1.
- (I) Two (2) air presses, identified as AP1 and AP2.
- (J) One (1) cut off saw, identified as COS1.
- (L) One (1) hydraulic crimper, identified as HC1.
- (M) One (1) lift-and-tilt process, identified as LT1.
- (N) One (1) saw, identified as S1.
- (O) Two (2) hydraulic presses, identified as HP1 and HP2.
- (P) Five (5) turret lathes, identified as TL1-TL5.
- (Q) One (1) vertical mill, identified as VM1.
- (R) One (1) Richard bender, identified as RB1.
- (S) One (1) metal muncher, identified as MM1.
- (T) One (1) spot welder, identified as SW1.
- (U) Two (2) plasma cutters, identified as PC1 and PC2.

(2) Insignificant activities associated with Plant 1, Building 2 (Metal Fabricating Area):

- (A) Three (3) hydraulic benders, identified as HB2-HB4.
- (B) Twenty-six (26) punch presses, identified as PP8-PP33.
- (C) One (1) hydraulic roller, identified as HR1.
- (D) Five (5) lift-and-filts, identified as LT2-LT6.

- (E) Three (3) grinders, identified as G7-G9.
- (F) One (1) disk sander, identified as DS4.
- (G) One (1) blade sharpener, identified as BS1.
- (H) Two (2) tube cut off saws, identified as TCOS1 and TCOS2.
- (I) Three (3) horizontal band saws, identified as HBS1-HBS3.
- (J) One (1) Tringiger saw, identified as TS1 (new added).
- (K) One (1) brake press, identified as BP1.
- (L) Two (2) shears, identified as S1 and S2.
- (M) Three (3) vertical mills, identified as VM2-VM3.
- (N) One (1) hone, identified as HN1.
- (O) Two (2) hydraulic presses, identified as HP3 and HP4.
- (P) One (1) radial drill, identified as RD1.
- (Q) One (1) drill press, identified as DP41 (new added).
- (R) One (1) vertical band saw, identified as VBS1.
- (S) One (1) belt sander, identified as BTS1.
- (3) Insignificant activities associated with Plant 2, Building 1 (Urethane Foaming, Vacuum Forming and Assembly Area):
 - (A) Two (2) vacuum formers, identified as VF1-VF2.
 - (B) One (1) oven/press, identified as OP1.
 - (C) One (1) stencil machine, identified as SM1.
 - (D) Four (4) belt sanders, identified as BLS1-BLS4.
 - (E) Six (6) band saws, identified as BAS1-BAS6.
 - (F) One (1) electric welder, identified as EW1.
 - (G) Two (2) hydraulic presses, identified as HP5 and HP6.
 - (H) Two (2) sanders, identified as SA1 and SA2.
 - (I) Six (6) mounted hand routers, identified as MHR1-MHR6.
 - (J) One (1) hydraulic tracing drill, identified as HTD1.
 - (K) One (1) cut off saw, identified as COS2.

- (L) Two (2) radial arm saws, identified as RAS1 and RAS2.
- (M) One (1) table grinder, identified as TG1.
- (N) Two (2) buffing jacks, identified as BJ1 and BJ2.
- (O) One (1) mechanical shear, identified as MS1.
- (P) One (1) bender, identified as B1.
- (Q) One (1) roller, identified as R1.
- (R) One (1) hydraulic crimper, identified as HC2.
- (S) One (1) air shear, identified as AS1.
- (T) One (1) lift-and-tilt, identified as LT8.
- (U) One (1) tumbler, identified as TU1.
- (V) Two (2) lathes, identified as L1 and L2.
- (W) Three (3) table saws, identified as TA1-TA3.
- (X) One (1) planer, identified as P1.
- (Y) One (1) jig saw, identified as JS1.
- (Z) Two (2) torches, identified as T1 and T2.
- (AA) Twenty (20) drill presses, identified as DP21-DP40.
- (4) Insignificant activities associated with Plant 2, Building 2 (Storage Area):
 - (1) Two (2) punch presses, identified as PP34 and PP35.
 - (2) One (1) hydraulic bender, identified as HB5.
 - (3) One (1) trash compactor, identified as TC1 (new added).

Existing Approvals

- (a) FESOP 141-7073-00128, issued on September 23, 1997.

All conditions from previous approvals were incorporated into this FESOP.

However, the emission units of the liquid argon storage tank (LA) and the liquid oxygen storage tank (LO) have been removed from this FESOP because these two tanks do not emit any regulated air pollutants and no permit conditions were applied to these tanks in the previous FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on December 18, 2001. Additional information was submitted on February 7, 2002. There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculation (page 1 through page 3).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	10.02
PM-10	10.02
SO ₂	Negligible
VOC	77.70
CO	Negligible
NO _x	Negligible

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Glycol Ethers	27.46
Cobalt Compounds	4.58
Methyl Ethyl Ketone	5.45
Toluene	1.25
TOTAL	38.74

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforcement limits that restrict Potential to Emit to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operator Permit (FESOP).
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards

that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on September 23, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F141-7073-00128 issued on September 23, 1997).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Metal Surface Coating (SC)	Negligible	Negligible	Negligible	62.48	Negligible	Negligible	Less than 10 for a single HAP and 25 for combination HAPs
Urethane Foam and Assembly (UFA)	—	—	—	15.22	—	—	
Metal Fabrication (MF) - insignificant sources	10.2	10.2	—	—	—	—	Negligible
Total PTE After Issuance	10.2	10.2	—	77.70	—	—	Less than 10 for a single HAP and 25 for combination HAPs

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The charging rate of the burn-off oven associated with the metal coating process (SC) is less than fifty (50) tons per day. Therefore, the New Source Performance Standards for Incinerators (40 CFR Part 60.50 - 60.54, Subpart E) are not applicable.
- (b) This source does not perform metal furniture surface coating operation. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not applicable.
- (c) This source does not perform any printing operations. Therefore, the New Source Performance Standards for Publication Rotogravure Printing (40 CFR 60.430-60.453, Subpart QQ) are not applicable.
- (d) This source does not perform metal coil surface coating operation. Therefore, the New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460-60.466, Subpart TT) are not applicable.

- (e) This source does not have any rotogravure printing line. Therefore, the New Source Performance Standards for Flexible Vinyl and Urethane Coating and Printing (40 CFR Part 60.580 - 60.585, Subpart FFF) are not applicable.
- (f) This source does not apply the surface coating to any business machines. Therefore, the New Source Performance Standards for Surface Coating of Plastic Parts for Business Machines (40 CFR Part 60.720 - 60.726, Subpart TTT) are not applicable.
- (g) The solvents applied for the degreasing operation (insignificant source) do not contain any halogenated HAP specified in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not applicable.
- (h) This source does not perform any of the following operations: publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry (40 CFR 63.820 - 63.839, Subpart KK) is not applicable.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source is not 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and has the potential to emit of any regulated pollutant less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The source was constructed prior to July 27, 1997 and has elected to limit their HAP emissions from the entire source to less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8-4, the HAPs input to the metal surface coating process (SC) and urethane foam and assembly process (UFA) shall be limited as follows:

- (a) The amount of any single HAP delivered to the dip tank and the hand application booth plus the amount of any single HAP used for clean-up shall be limited to 10 tons per twelve (12) consecutive month period.
- (b) The amount of any combination of HAPs delivered to the dip tank and the hand application booth plus the amount of any combination of HAPs used for clean-up, shall not exceed 25 tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons of VOC per year and is located in St. Joseph County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Metal Surface Coating Process (SC)

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This dip tank performs the metal coating process and the source is under the Standard Industrial Classification Code of major group #37. Therefore, the VOC content of the coatings applied to this facility shall be limited as follows:

- (a) Three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to the applicators that apply extreme performance coatings.
- (b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee, the VOC content of the coating delivered to the dip tank is in compliance with the requirements above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The requirements of 326 IAC 8-1-6 do not apply because 326 IAC 8-2-9 has applies to this facility.

326 IAC 6-3-2 (Process Operations)

There is no PM emitted from the dip tank, therefore, 326 IAC 6-3-2 does not apply to this tank.

326 IAC 4-2 (Incinerator Requirements)

The burn-off oven associated with the coating process is considered to be an incinerator according to the definition in 326 IAC 4-2-1. Therefore, this burn-off oven shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

State Rule Applicability - The Urethane Foaming and Assembly Process (UFA)

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

According to the emission calculations in Appendix A, the potential emissions of VOC from the hand application booth is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply to this process. Any change or modification which may increase the potential VOC emissions from the hand application booth to greater than twenty-five (25) tons per year must be approved by IDEM, OAQ before any such change may occur.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

326 IAC 8-2-9 does not apply to this urethane foaming and assembly process, since this process only applies the adhesives to the plastic parts.

326 IAC 6-3-2 (Process Operations)

326 IAC 6-3-2 does not apply to this urethane foaming and assembly process, since this process does not emit any PM.

State Rule Applicability - Insignificant Sources

326 IAC 6-3-2 (Process Operations)

The allowable emission particulate matter (PM) emission rate from the metal fabrication process (MF) and all of the working and storage areas shall not exceed the allowable emission rate based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8-3-2 (Cold Cleaner Operation)

This source is located in St. Joseph County and its potential emissions of volatile organic compounds is less than 100 tons per year. Therefore, 326 IAC 8-3-2 does not apply.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilo Pascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5 (b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

No testing requirements were included in the previous FESOP or in this FESOP because the compliance methods for the major pollutant (HAP), are based on mass balance and record keeping.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There is no compliance monitoring requirements included in the previous FESOP or this FESOP because the compliance methods are based on mass balance and recordkeeping.

Conclusion

The operation of this truck/container component manufacturing plant shall be subject to the conditions of the attached proposed (FESOP No.: F141-15168-00128).

Appendix A: Emission Calculations
VOC and HAPs
From the Metal Surface Coating Process (SC)

Company Name: Penz Products, Inc.
Address City IN Zip: 1320 S. Merrifield Avenue, Mishawaka, IN 46544
FESOP: F141-15168-00128
Reviewer: ERG/YC
Date: January 9, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (tons/yr)	Weight % Glycol Ethers	Glyco Ethers Emissions (tons/yr)	Weight % Cobalt Compound	Cobalt Compound Emissions (tons/yr)
Primer	11.72	43.14%	29.49%	13.65%	41.44%	37.25%	0.0033	2702.0	1.60	14.26	62.48	6.00%	27.46	1.00%	4.58

State Potential Emissions

Total VOC
62.48
tons/yr

Total HAPs
32.04
tons/yr

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential HAP Tons per Year = Weight % HAP * Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
VOC and HAPs
From the Urethane Foaming and Assembly Process (UFA)

Page 2 of 3 TSD App A

Company Name: Penz Products, Inc.
Address City IN Zip: 1320 S. Merrifield Avenue, Mishawaka, IN 46544
FESOP: F141-15168-00128
Reviewer: ERG/YC
Date: January 9, 2002

1. Emissions from urethane foam machines:

The urethane polymer has almost 0% VOC. Therefore, the VOC and HAP emissions from these urethane foam machines are negligible.

2. Emissions from hand application booth:

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (tons/yr)	Weight % Methyl Ethyl Ketone	Methyl Ethyl Ketone Emissions (tons/yr)	Weight % Toluene	Potential Toluene Emissions (tons/yr)
Foam	9.22	0.00%	0.00%	0.00%	0.00590	350.0	0.00	0.00	0.00	0.00%	0.00	0.00%	0.00
MEK	6.73	100.00%	0.00%	100.00%	0.00053	350.0	6.73	1.25	5.47	99.75%	5.45	0.00%	0.00
Adhesive 6130	6.92	60.00%	20.00%	40.00%	0.00014	350.0	2.77	0.14	0.59	0.00%	0.00	20.00%	0.30
Adhesive 4045	7.26	74.00%	15.00%	59.00%	0.00014	350.0	4.28	0.21	0.92	0.00%	0.00	0.00%	0.00
Adhesive 6325	8.92	50.00%	0.00%	50.00%	0.00014	350.0	4.46	0.22	0.96	0.00%	0.00	50.00%	0.96
S1018	8.96	100.00%	0.00%	100.00%	0.00053	350.0	8.96	1.66	7.28	0.00%	0.00	0.00%	0.00
Total									15.22		5.45		1.25

Note: Since the transfer efficiencies for these material are 100%, there is no PM emission from this process.

State Potential Emissions

Total VOC
15.22
tons/yr

Total HAPs
6.71
tons/yr

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential HAP Tons per Year = Weight % HAP * Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)